

**REMARKS**

Claims 1-9 are pending and stand rejected. Applicant has added new claim 10, and canceled claim 9, without prejudice. Applicant explicitly reserves the right to reintroduce features of claim 9 at a later point in prosecution either in this application or in a continuation application.

Applicant appreciates the courtesy extended to the undersigned attorney during the recent personal interview in which the claims were discussed in relation to Greene and Dumais. No Agreement was reached.

Claims 1-8 stand rejected under 35 USC 101. Applicant appreciates the Examiner's suggestions and has amended the claims to more distinctly recite structural features. Reconsideration and withdrawal of the rejection in view of the amendments is respectfully requested.

Claims 1, 2 and 6 stand rejected under 35 USC 103(a) as being unpatentable over Greene (US 6377925) in view of Dumais (US 20040267700). Applicant respectfully traverses as follows.

Applicant has amended claim 1 to more distinctly recites that in the record mode the decoded text is stored in a database.

Greene discloses an electronic translator which decodes voice into text, displays the text and/or displays a sign language and possibly speaks the decoded word. A device according to Greene does not store any of the decoded speech in a database, a feature of claim 1.

A device according to Greene only translates voice into text – there are no explicit data processing requests for storing data to a database or implicit (implied) requests which are queued for background processing to process text stored in the database. Consequently, Greene fails to disclose or suggest any way for distinguishing between implicit and explicit processing requests. As such, Greene fails to disclose or suggest the aspect of the invention where a dialog manager module executed by the microprocessor is configured to **examine the decoded text** to distinguish between explicit and implicit data processing requests in the record mode.

Greene fails to disclose or suggest the feature of claim 1 where implicit data processing requests are requests which are queued and processed in the background between explicit requests and explicit data processing requests are requests immediately passed to the microprocessor. Green may put text in a buffer but Greene does not disclose or suggest queuing implicit data requests in a database while immediately passing explicit requests to the microprocessor. Still further, Green fails to disclose or suggest the feature of claim 1 where said dialog manager is configured to treat all requests received in said dialog mode as explicit data processing requests.

Like Greene, Dumais fails to disclose or suggest the feature of the claimed invention wherein the dialog manager has a record mode and a dialog mode, and in “said record

mode said dialog manager examining said decoded text received to determine whether it contains an explicit or an implicit data processing request.”

Applicant respectfully notes that there are no processes to prioritize in either Dumais or Greene. Again, Greene discloses a real-time system in which spoken words are immediately decoded into text and the text or a person signing the text is displayed. There is nothing to prioritize, and consequently the reason advanced by the Examiner for combining these two references is inapposite. For at least these reasons, Applicant respectfully requests that the rejection of claim 1, 2 and 6 be reconsidered and withdrawn.

Claims 3-5, and 7-9 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Greene in view of Dumais and in further view of Dunning US 7,162,482.

As a preliminary matter, Applicant respectfully traverses the rejection of claims 3-5 and 7-9 for the reasons articulated above in traversing the rejection of claims 1, 2 and 6.

Applicant further traverses the rejection as applied to claims 3 and 4 because the combination fails to disclose the feature wherein the dialog manager identifies an explicit data processing request during said *dialog mode* by comparing said *decoded text* against a list of predefined data processing requests, assigning a match score to each of said predefined data processing requests and selecting said predefined data processing request having a highest matching score as said explicit data processing request.

None of the cited references examine the decoded text to see whether it contains an explicit data processing request. Greene decodes audio into text and processes the text but never checks the text to see if it contains a request. Greene discloses a dictionary but the dictionary is never used to determine explicit data processing requests but rather to see whether the word was correctly decoded. Dumais indexes and stores text but never checks to see if the text contains a request. Dunning too fails to examine decoded text to see if it contains an explicit data processing request. Thus the combination fails to disclose or suggest features of claims 3 and 4.

With respect to Claim 5, the rejection fails to address the features of the claim with specificity and fails to point to those portions of Dunning relied upon in support of the rejection. For Example, the Examiner asserts that “Dunning discloses the claimed aspect of otherwise( $\geq$ threshold) passes characteristic words selected from said retrieved data records, and said dialog manager instructs said output module to prompt the user to select a given said characteristic word used refine the data processing request, wherein FIG. 8 shows a method of forming a word from letters.” There is a mismatch between the literal words of the rejection and the features of the claim. FIG. 8 of Dunning does not disclose or suggest anything relevant to the features of Claim 5. Applicant respectfully requests that the Examiner cite where Dunning discloses information storage/retrieval module passes to said dialog manager a specified number of data records retrieved in response to

said data processing request if a number of retrieved data records is below a threshold number and *otherwise* passes characteristic words selected from said retrieved data records, and said dialog manager instructs said output module to prompt the user to select a given said characteristic word used refine the data processing request.

Applicant further traverses the rejection as applied to Claims 7 and 8 because the asserted combination fails to disclose the recited features of the claims. The claims recite specific features whereas the rejection asserts broad principles which fail to disclose or render obvious the recited features.

For example, claim 7 recites that the information storage/retrieval module stores atoms of data, each said atom having a unique identifier; and that the local word table contains a list of words contained in each atom of data and the number of times each word appears in a given atom. The cited combination of references fails to disclose or suggest this feature of claim 7. Claim 7 further recites that if a number of atoms matching a data retrieval request exceeds a predetermined number, the dialog manager *prompts a user to select a given characteristic word from a list of characteristic words*, said characteristic words being derived from the local word tables of atoms matching said data retrieval request, said selected characteristic word being appended to a search string of the data retrieval request, thereby reducing the number of atoms matching a data

retrieval request. Again, the cited combination of references fails to disclose or suggest this feature of claim 7.

Should the claims herein be allowable but for minor matters that could be the subject of either a further submission by Applicants or an Examiner's Amendment, Applicants would appreciate the Examiner's contacting Applicants' undersigned attorney.

Reconsideration and allowance of all the claims herein are respectfully requested.

Respectfully Submitted,

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